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International Union of Operating
Engineers, Local No. 68 Welfare Fund
(an unincorporated trust)

Plaintiff,

v.

AstraZeneca PLC; et al.

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MONMOUTH COUNTY

CIVIL ACTION NO. MON-L-3136-06

**NOTICE OF MOTION FOR ENTRY OF
CASE MANAGEMENT ORDER 3**

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AND TO ALL DEFENSE COUNSEL ON SERVICE LIST

PLEASE TAKE NOTICE that on September 7, 2007, at a time to be determined by the Court, or at a time on another date to be determined by the Court, The Haviland Law Firm, LLC and Keefe Bartels, Co-Lead Counsel for Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund, and for the Class, shall, pursuant to Rule 4:24-1(c), move before the Honorable Louis F. Locascio, J.S.C., Superior Court of New Jersey, Law Division, Monmouth

County, for entry of Case Management Order 3, a proposed form of which is submitted herewith. Plaintiff will rely on the Certification of Counsel in support of the Motion, which has been filed and served simultaneously herewith.

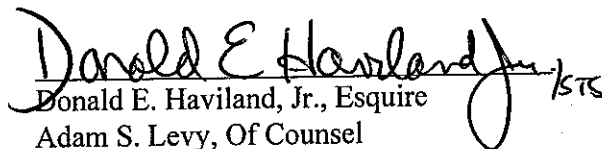
The Motion is being filed at this time to comply with the time requirements for filing motions to extend discovery under Rule 4:24-1(c) and, specifically, in time to obtain a return date no later than the current Discovery End Date of September 7, 2007, as established by operation of this case being designated a Track IV case in Case Management Order 1.

I certify that the Clerk of Monmouth County was served on this date with the original motion papers via Federal Express. Additionally, I certify that all counsel of record were served on this date with a copy of these motion papers via LexisNexis, the Court-approved electronic document delivery system.

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests oral argument on this Motion.

Dated: August 21, 2007

By:

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